UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

09 AUG 2007

MEMORANDUM

SUBJECT: Young Radiator Company
Dewey Road
Centerville, Iowa
EPA ID# IAD040611121

FROM: Alex Owutaka AO
ARTD/RCAP

Howard Bunch
CNSL

TO: Lynn Slugantz, Chief
ARTD/RCAP

This memorandum supports a determination that corrective action is complete at Young Radiator Company (YRC), Dewey Road, Centerville, IA (EPA RCRA ID# IAD 040611121). This memorandum also recommends a recording of CA 999 (no further action) data code in RCRA Info for YRC. YRC received a NCAP ranking of "Low" during the FY '94 National Corrective Action Priority (NCAPs) Annual Review/Update.

Facility Information:

YRC manufactured radiators for military and civilian vehicles. The manufacturing process at the facility included machining, soldiering, and painting of metallic radiator parts. Industrial wastewater from the manufacturing process was directed to a wastewater treatment tank through an underground drainage system. Wastewater treatment inside the tank was mainly by filtration. The filtrate was discharged to the city's sewer system under a municipal discharge permit. Residual sludge was dried, packed and shipped offsite for disposal.

In a Complaint, Compliance Order and Notice of Opportunity for Hearing issued by EPA on September 20, 1989, EPA alleged that YRC stored hazardous wastes at two onsite storage areas for more than 90 days without permit or interim status. EPA also alleged that there were violations of hazardous waste management regulations due to open and leaking containers. EPA directed the facility to: 1) move all hazardous waste storage containers to an approved offsite Treatment, Storage, Disposal (STD) facility, and 2) submit a closure plan for the two storage areas.

YRC subsequently submitted a closure plan to EPA for the two container storage areas. EPA approved this plan on August 17, 1992. The closure plan stated that the container storage area (Unit A) stored seven 55-gallon drums of xylene-contaminated paint. The other container storage area (Unit B) stored one 55-gallon drum of spent trichloroethylene. The dimensions of Unit A were 15 feet by 5 feet and that of Unit B were 5 feet by 7 feet. The contaminants of concern (COCs) were xylene for Unit A and trichloroethylene for Unit B.

Closure activities for the two container storage areas were conducted in November 1992 and consisted mainly of collection and analysis of soil samples. Clean-up objectives were: 1 mg/kg xylene for soils in Unit A, and 1 mg/kg trichloroethylene for soils in Unit B. Hand auger and split-spoon sampler were used to collect soil samples within the perimeter of the two storage units. Soil samples were collected using a hand auger and split-spoon sampler. Samples were collected within each unit at the 0-6, 6-12, and 12-18 inch intervals below the ground surface.

The soil samples collected from Unit B were below the cleanup target level for trichloroethylene. However, soil samples collected from five locations within Unit A showed elevated concentrations of xylene above the clean up target level.

In accordance with the approved closure plan, the facility developed and submitted a "Plan for Oversight Activities" (PAO) to EPA, which EPA approved in early 1993. In accordance with the PAO, the facility sampled soils from six locations within the perimeter of Unit A to determine the vertical and horizontal extent of xylene contamination. Soil samples were collected at the 0-12", 12-24", 24-36", and 36-48" intervals in the horizontal and lateral directions around each contaminated area. After extent of contamination has been determined, contaminated soils were excavated from Unit A and disposed of as hazardous waste.

The report of a Compliance Evaluation Inspection (CEI) conducted by EPA during closure of Units A&B stated that the facility conducted all closure activities in accordance with the approved closure report. The CEI report also stated that there were several less than-90-day accumulation areas at the facility. One of these accumulation areas contained three open 55-gallon drums containing wastes. One 55-gallon drum was labeled as hazardous waste. Another 55-gallon drum, which was labeled as waste oil, was observed to be leaking. The area in which this and five other non-empty drums were located was not designated or marked as a hazardous waste storage area. Also, one cubic-yard super sack of dried wastewater sludge and waste paint filters were observed in three separate accumulation areas at the facility.

A letter of September 27, 1993 from the RCRA section chief accepted the closure report and certification for clean-closure of the two hazardous waste container units (Storage Units A & B). This letter stated that closure was completed in accordance with the approved closure plan.

A February 23, 2000 biennial hazardous waste report indicated that the facility was a large quantity generator and generated D008, D001, F003, D006 wastes. A report from a Dec. 21, 2000 CEI conducted at the facility by EPA stated that the facility shut down operations during the first quarter of 2000. The CEI also stated that the inspectors could not gain access into the facility due to locked gates. The inspectors stated however that they were able to observed through the facility fence that there wase no evidence of stressed vegetation or spills at the facility to indicate past spill(s) of hazardous waste.

RECOMMENDATION:

After the review of files, a recommendation of no further corrective action is being made for Young Radiator Company. Also, the facility should be reclassified as a CA 999 (corrective action complete) in RCRA Info. This recommendation is based on the fact that the facility clean-closed the hazardous waste management unit and ceased manufacturing activities at the facility in 2000.